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Lead Counsel for the Indirect-Purchaser Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

) Master File No. 3:07-cv-5944 SC

) MDL No. 1917

This Document Relates to:

Indirect-Purchaser Class Action

) **DECLARATION OF GERARD A.
DEVER IN SUPPORT OF**

) **INDIRECT PURCHASER PLAINTIFFS'
NOTICE OF MOTION AND MOTION
IN LIMINE NO. 8:**

) **TO PRECLUDE REFERENCE TO AND
EXCLUDE EVIDENCE OF THE
ABSENCE OF CRIMINAL
INDICTMENT, CONVICTION OR
GUILTY PLEA**

) Hearing Date: February 27, 2015

) Time: None set

) Courtroom: One, 17th Floor

) The Honorable Samuel Conti

1 I, Gerard A. Dever, hereby declare and state as follows:

2 1. I am a member of the law firm Fine, Kaplan and Black, R.P.C., counsel for the
3 Indirect Purchaser Plaintiffs in the above-captioned action currently pending in the U.S. District
4 Court for the Northern District of California. I am a member in good standing of the bar of the
5 Commonwealth of Pennsylvania and I am admitted *pro hac vice* to practice before this Court. I
6 submit this Declaration in support of Plaintiffs' Motion *in Limine* No. 8: to preclude reference to
7 and exclude evidence of the absence of criminal indictment, conviction or guilt plea.

8 2. Attached hereto as **Exhibit A** is a true and correct copy of the January 9, 2013
9 Minute Order in *In re Urethanes Antitrust Litig.*, No. 04-1616 (D. Kan.) (Dkt. No. 2961).

10 I declare under penalty of perjury under the laws of the United States that the foregoing is
11 true and correct.

12 Executed on February 13, 2015, in Philadelphia, Pennsylvania.

13
14 /s/ Gerard A. Dever

15 Gerard A. Dever

16 Fine, Kaplan and Black, R.P.C.

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